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AT ABINGDON, VA
FILED

NOV - 1 2021

JULIA C. DUDLEY, CLERK
BY: *A. Meade*
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

MELINDA SCOTT,)

)

PLAINTIFF.)

)

V.)

CL NO. 2:20cv14

)

WISE CO. DSS,)

ET AL.,)

)

DEFENDANTS.)

MOTION TO SEAL/FOR PROTECTIVE ORDER

COMES NOW, the Plaintiff, Melinda Scott, and states as follows:

On October 23, 2021 Defendant Moon, by counsel, filed a Reply with accompanying exhibits (docket #99). In the accompanying exhibits (docket #99-attachment 3) Defendant Moon's counsel attached documents from court records *not* normally available to the public that had identifying information about the Plaintiff, including (a) residential information (b) vehicle make and model and (c) place of (graduate) school attendance (d) location of banking and (e) whereabouts of her children. Defendant Moon's counsel did not use any courtesy or discretion when posting this information and likely did it to try to jab at the Plaintiff, as one of the exhibits had no relevance to his Reply.

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On October 23, 2017 docket #99-attachment 3 was uploaded by a user of the website owned by Defendant Moon, KiwiFarms.net. Between March 13, 2017 and the present date, users of Defendant Moon's website KiwiFarms.net have engaged in Cyberstalking behaviors, including but not limited to: (a) tracking the Plaintiff's residential information¹ (b) tracking the Plaintiff's county of residence² (c) tracking the Plaintiff's whereabouts³ (d) sharing information from their findings of bullets (a) through (c) for an international audience by posting it on the website KiwiFarms.net, (d) sent the Plaintiff harassing emails saying they intended to use her residential information to exploit and harm her (docket #43, Exhibit A), (e) made death threats to the Plaintiff (docket #43, exhibit B) (f) made threats to do bodily injury to the Plaintiff⁴ (g) made threats to do bodily injury to her children⁵ and (h) made threats to stalk her children through "doxxing" and otherwise⁶ (also docket #43, exhibit A). Additionally, Joshua Moon has made threats to use the Plaintiff's residential information to harass her, send drunkards to her house and cause bodily injury⁷.

¹ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-6902180>

² <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-10233989>

³

<https://kiwifarms.net/threads/2018-12-12-melinda-leigh-scott-v-andrew-carlson-joshua-moon-sherod-degrippo.50975/post-4097481>

⁴ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-6005455>

⁵ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-6939700>

⁶ <https://kiwifarms.net/threads/melinda-leigh-scott-marshall-castersen.32118/post-10278703>

⁷ Joshua Moon owns a YouTube channel called "MATI Archive". In a YouTube video published on his channel, which was entitled "The Fungus Among Us" and published September 10, 2021, Joshua Moon stated he had: (a) the intent to harass the Plaintiff via third parties he planned to hire and send to her house (b) the intent to cause the Plaintiff bodily injury through a third party he planned to hire and send to her house, (c) the intent to send drunkards, intimidating strangers and trouble makers who bring crime to the Plaintiff's house to take her money and property. The hyperlink to the video is <https://www.youtube.com/watch?v=2BCenYW0Lw0>/// His statements appear on the following at timestamps: (1) Intent to send a harassing drunkard: 1:05:50: "I need aggravating white trash in the state of Virginia willing to visit this house and demand property...I need the most lickerish man that has ever lived to wear a GoPro and record himself..." (2) Intent to cause bodily injury by a third party: 1:06:34: "I need someone...who can handle himself in a physical confrontation" (3) Intent to harass the Plaintiff via a third party: 1:06:58: "My thought is, if she's currently being harassed by white trash incarnate, she cannot sue me anymore..." (4) Intent to engage in phone harassment 1:07:10: "being called at random hours of the day" (5) Intent to send strangers to the Plaintiff's residence: 1:07:15 "and being visited by a strange man..." (6) Intent to use video footage for Internet Harassment: (a) 1:07:34: "You can stream the footage" and (b)

Plaintiff petitions this court, by motion, for the following:

(A) that this court order *any* of Defendant Moon's counsel of record to cease and desist from electronically publishing any exhibit containing the Plaintiff's (1) residential address, (2) county of residence, (3) places of employment or business, (4) place of attendance at any graduate school (5) make, model, year of vehicles and (6) whereabouts of children and (7) any other identifying information which can be improperly used for stalking or in violation of a law, such as social security numbers, etc; AND

(B) that this court require Defendant Moon's counsel to submit directly to the Clerk of the court any exhibit that contains identifying information which can be improperly used for stalking or in violation of a law such as the Plaintiff's (1) residential address, (2) county of residence, (3) places of employment or business (4) place of attendance at any graduate school (5) make, model, year of vehicles (6) her children's whereabouts and (7) any other identifying information such as social security numbers, etc; AND

(C) that this court seal any more exhibits submitted by any counsel of record which contains identifying information about the Plaintiff and which could be improperly used for stalking or in violation of a law such as the Plaintiff's (1) residential address, (2) county of residence, (3) place of employment or business, (4) place of attendance at any graduate school (5) make, model, year of vehicles and (6) any other identifying information such as social security numbers, etc;

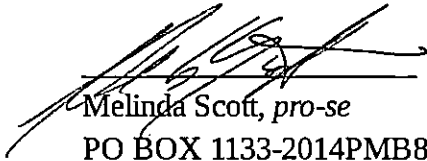
1:07:37 "As long as I can also do whatever I want with the footage.(7) Intent to send a troublemaker who brings crime along with him to Plaintiff's house: "Ice Poseidon needs money, right?". "Ice Poseidon" (Paul Denino) is another toxic website owner whose followers commit crimes against people featured on his show (See <https://dotesports.com/streaming/news/ice-poseidon-releases-open-letter-to-twitch-apologizes-for-past-behavior>)

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I ASK FOR THIS,

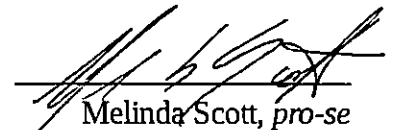


Melinda Scott, *pro-se*
PO BOX 1133-2014PMB87 (VA ACP address)
Richmond, VA 23218
540-692-2342
mscottw@gmu.edu

CERTIFICATE OF SERVICE

I certify that I have mailed a copy of this MOTION TO SEAL/FOR PROTECTIVE ORDER to Counsel for the Defendant, Matthew D. Hardin, VSB #87482, 1725 I Street NW, Suite 300, Washington, D.C., 20006, and at matthewdhardin@gmail.com on this 27th day of OCT., 2021.

SIGNED,



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